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**VIA ECF**

Hon. James R. Cho  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: *Karnes et al v. City of New York et al.*, 21-CV-4903 (WFK) (JRC)**

Your Honor:

The parties jointly move the court for an additional 36 days to update Your Honor on settlement and discovery.

As discussed in our June 17, 2024, and September 16, 2024, letters the plaintiff has been working on a lifecare plan. The obstacles were some difficult to obtain medical records. Those obstacles have been overcome, and a life care plan has been written and provided to our economist. We expect to get the present value of the life care plan report from our economist in the next day or two (thought we were going to have it last week). Once we get those expert reports to the City, Mr. Francolla believes he will have meaningful thoughts on the direction of settlement by Tuesday, January 21, 2024. Should this motion be granted, we will update the court on what we suggest the most expeditious way to advance the case to settlement or trial at that time.

The parties thank the Court for its attention to this matter.

Respectfully submitted,



David B. Rankin